

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

*All Cases Noted on Attached Exhibit*

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO FLORIDA WALGREENS SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendant Walgreens Boots Alliance, Inc.<sup>1</sup> that, pursuant to the election of each Dismissing Plaintiff to participate in the Walgreens Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any Walgreens Defendant (as defined in the footnote below) are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

---

<sup>1</sup> The Walgreens Settlement Agreement attached as Appendix B is between the State of Florida, Office of Attorney General on the one hand and Walgreens Boots Alliance, Inc. and Walgreen Co. on the other, but the Walgreens Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which include not only Walgreen Boots Alliance, Inc. and Walgreen Co. but also other affiliated or related entities as defined in the Walgreens Settlement Agreement (“Walgreens Defendants”). Walgreens Settlement Agreement §§A(bb) & A(cc). To the extent the parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the parties shall stipulate to the dismissal of those claims in a subsequent filing.

Dated: June 29, 2022

Respectfully submitted,

Agreed as to form and substance:

/s/ Kaspar J. Stoffelmayr

Kaspar J. Stoffelmayr  
Katherine M. Swift  
BARTLIT BECK LLP  
54 West Hubbard Street  
Chicago, IL 60654  
(312) 494-4400  
kaspar.stoffelmayr@bartlitbeck.com  
kate.swift@bartlitbeck.com

*Attorneys for Defendants Walgreens  
Boots Alliance, Inc., Walgreen Co., and  
Walgreen Eastern Co.*

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)  
ROBBINS GELLER RUDMAN  
& DOWD LLP  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
(561) 750-3000  
(561) 750-3364 (Fax)  
mdearman@rgrdlaw.com

*Counsel for City of Pompano Beach (1:19-op-  
45087-DAP)  
City of Delray Beach (1:18-op-45051-DAP)*

/s/ Matthew S. Daniel

Matthew S. Daniel  
FERRER POIROT & WANSBROUGH  
2603 Oak Lawn Ave., Suite 300  
Dallas, TX 75219  
(214) 521-4412  
(866) 513-0115 (Fax)  
mdaniel@lawyerworks.com

*Counsel for Lee County (1:19-op-45671-DAP)*

/s/ Bernice C. Lee

Bernice C. Lee (FL Bar No. 0073535)  
KOZYAK TROPIN & THROCKMORTON, LLP  
2525 Ponce de Leon Boulevard, 9th Floor  
Coral Gables, FL 33134  
(305) 372-1800  
(305) 372-3508 (Fax)  
blee@kttlaw.com

*Counsel for the City of Coral Gables (1:18-op-  
45852-DAP)*

/s/ Peter J. Mougey

Peter J. Mougey (FL Bar No. 191825)  
LEVIN, PAPANTONIO, RAFFERTY,  
PROCTOR, BUCHANAN, O'BRIEN, BARR,  
MOUGEY, P.A.  
316 South Baylen Street  
Pensacola, FL 32502  
(850) 435-7000  
pmougey@levinlaw.com

*Counsel for Bay County (1:18-op-45455-DAP)*  
*City of Bradenton (1:18-op-46331-DAP)*  
*City of Miami Gardens (1:18-op-45873-DAP)*  
*City of New Port Richey (1:19-op-46073-DAP)*  
*City of Niceville (1:21-op-45081-DAP)*  
*City of North Miami (1:18-op-45872-DAP)*  
*City of Ormond Beach (1:19-op-46121-DAP)*  
*City of Panama City (1:18-op-45373-DAP)*  
*City of Pensacola (1:18-op-45331-DAP)*  
*City of Pinellas Park (1:18-op-45807-DAP)*  
*City of St. Petersburg (1:18-op-45701-DAP)*  
*City of Tallahassee (1:18-op-46243-DAP)*  
*Escambia County (1:18-op-45729-DAP)*  
*Leon County (1:18-op-46242-DAP)*  
*Miami-Dade County (1:18-op-45552-DAP)*  
*Pinellas County (1:18-op-45742-DAP)*  
*Santa Rosa County (1:18-op-45861-DAP)*  
*Volusia County (1:18-op-45782-DAP)*

/s/ James D. Young

James D. Young (FL Bar No. 567507)  
MORGAN & MORGAN COMPLEX  
LITIGATION GROUP  
76 S. Laura Street, Suite 1100  
Jacksonville, FL 32202  
(904) 361-0012  
(904) 366-7677 (Fax)  
jyoung@forthepeople.com

*Counsel for City of Deerfield Beach (1:19-op-45021-DAP)*  
*City of Fort Lauderdale (1:18-op-46329-DAP)*  
*City of Lauderhill (1:18-op-45120-DAP)*  
*City of Orlando (1:20-op-45223-DAP)*

/s/ Shayna E. Sacks

Shayna E. Sacks  
NAPOLI SHKOLNIK, PLLC  
360 Lexington Avenue, 11th Floor  
New York, NY 10017  
(212) 397-1000  
ssacks@napolilaw.com

*Counsel for Alachua County (1:18-op-45685-DAP)*  
*Levy County (1:18-op-46119-DAP)*  
*Okaloosa County (1:19-op-45894-DAP)*  
*Osceola County (1:18-op-45669-DAP)*  
*Palm Beach County (1:18-op-46121-DAP)*  
*Walton County (1:19-op-45423-DAP)*

/s/ Keith Jackson

Keith Jackson  
RILEY & JACKSON, P.C.  
3530 Independence Drive  
Birmingham, AL 35209  
(205) 879-5000  
(205) 879-5901(Fax)  
www.rileyjacksonlaw.com

*Counsel for the City of Lynn Haven (1:19-op-46006-DAP)*

/s/ Eric Romano

Eric Romano (FL Bar No. 120091)  
ROMANO LAW GROUP  
801 Spencer Drive  
West Palm Beach, FL 33409  
(561) 533-6700  
(561) 533-1285 (Fax)  
eric@romanolawgroup.com

*Counsel for Bradford County (1:19-op-45564-DAP)*  
*City of Apopka (1:19-op-45883-DAP)*  
*City of Coral Springs (1:19-op-46123-DAP)*  
*City of Daytona Beach (1:19-op-45598-DAP)*  
*City of Daytona Beach Shores (1:19-op-45587-DAP)*  
*City of Deltona (1:19-op-45586-DAP)*

*City of Florida City (1:19-op-45594)*  
*City of Ft. Pierce (1:19-op-45595-DAP)*  
*City of Homestead (1:19-op-45980-DAP)*  
*City of Ocala (1:19-op-45834-DAP)*  
*City of Ocoee (1:19-op-45966-DAP)*  
*City of Oviedo (1:19-op-45584-DAP)*  
*City of Palatka (1:19-op-45984-DAP)*  
*City of Port St. Lucie (1:19-op-45596-DAP)*  
*City of Sanford (1:19-op-45599-DAP)*  
*City of St. Augustine (1:19-op-45592-DAP)*  
*City of Sweetwater (1:19-op-45914-DAP)*  
*Clay County (1:19-op-45591-DAP)*  
*Dixie County (1:19-op-45604-DAP)*  
*Gilchrist County (1:19-op-45605-DAP)*  
*Hamilton County (1:19-op-45589-DAP)*  
*Lake County (1:19-op-45588-DAP)*  
*Manatee County (1:19-op-45044-DAP)*  
*Marion County (1:19-op-45272-DAP)*  
*Orange County (1:19-op-45797-DAP)*  
*Putnam County (1:19-op-46122-DAP)*  
*Seminole County (1:19-op-45565-DAP)*  
*St. Johns County (1:19-op-45563-DAP)*  
*St. Lucie County (1:19-op-45656-DAP)*  
*Suwannee County (1:19-op-45590-DAP)*  
*Taylor County (1:19-op-45597-DAP)*  
*Town of Eatonville (1:19-op-46014-DAP)*  
*Union County (1:19-op-45603-DAP)*

/s/ Sara D. Aguiniga

Sara D. Aguiniga  
MOTLEY RICE LLC  
401 9th Street, NW, Suite 630  
Washington, DC 20004  
(202) 232-5504  
saguiniga@motleyrice.com

*Counsel for Sarasota County (1:19-op-45339-DAP), City of Clearwater (1:19-op-45009-DAP), and City of Miami (1:18-op-45664-DAP)*

SO ORDERED this 29th day of June, 2022.

/s/Dan Aaron Polster  
Hon. Dan Aaron Polster  
United States District Judge